

Matter 2a

1. Lack of a visible “Brownfield first” philosophy:

Cambridge City Council claim to have rigorously explored the potential use of Brownfield Sites in Cambridge City. The ‘Technical Background Document – Site Assessments Within Cambridge’ would seem to evidence this as the Council proactively investigated possible sites. We cannot find anything comparable in policy or actions to suggest that South Cambridgeshire District Council did the same and it appears that they relied totally on a Call for Sites strategy.

It appears that some Brownfield sites in sustainable locations were rejected in favour of Green Belt sites in assumed sustainable locations. An example of this is the ‘Oakington Tomato Farm’ site where a mixed Brownfield and Greenfield site is available, close to current services and the Guided Bus. We are concerned that there are areas not in the Green Belt that appear to be available and have been rejected yet Green Belt sites have been allocated for development. This conflicts with paragraph 17 in the NPPF.

There has been an assumption about low quality Green Belt in villages, that is Green Belt that does not serve a purpose in protecting the historic character of Cambridge. The NPPF does not make this distinction and therefore this strategy is contrary to NPPF paragraph 17 (point 8).

The Brownfield Site in Histon, the former Bishop’s Hardware Store, (SHLAA ref. 308) was considered in each of the ‘packages’ tested in the SA Report Part 3: appendix 4 but then in the council’s ‘preferred package’, package 9, it is not included but the Green Belt site off Impington Lane, (SHLAA reference 112 & 114) is.

Green Belt sites have been allocated very early on in the housing trajectory. It would be possible to delay the use of small Green Belt sites, without affecting the overall continuous housing supply. The development of the SCDC and City Council’s recent Memorandum of Understanding on the Greater

Cambridge Joint Housing Trajectory would allow this to happen. If Green Belt is to be protected and only released in 'exceptional circumstances', there is an argument for a sequential policy tied to land supply – so that only when land supply falls below a the 5 year supply, would Green Belt release be brought forward.

There are some sites that the City Council rejected, the assessment of some of these is questionable, that could be revisited with a view to using Brownfield land within the City and protecting Green Belt elsewhere. An example of this is the City site 022, Bishop's Court Trumpington or site 676 at Cherry Hinton.

2. Delivering sustainable developments in Rural Centres:

Despite a position well down the perceived sustainability hierarchy, Rural Centres have been presented as a prime opportunity for large scale developments, with an implication that essential supporting services and key infrastructure can always be upgraded to mitigate against any sustainability threats posed by a new development.

The reality in a time of austerity and limited public financial resources is very different! In order to achieve the golden thread of successful sustainable development, more care is needed, before a new development is approved, to confirm that essential facilities and infrastructure issues can be upgraded successfully within the current financial limitations and the time frame required to achieve a truly sustainable development.

Our own Rural Centre village, has examples of this issue, with an oversubscribed infants school and no room to build new classrooms on site, plus a new drainage report linked to recent village flooding that suggests considerable expenditure may be required to upgrade the village surface water and sewage drainage capacity in line with recent increased loading, perhaps due to the consequences of climate change.

For example, site 112 has been allocated in the plan without full consideration and knowledge of the impact of a potential development site that would be located adjacent to a level 3 flood risk zone that carries the main drain for removal of flood water from large areas of the village and surrounding areas. The report mentioned above states that: 'The predicted flooding is mainly linked to flooding from the Award Drains although some locations can be linked to under capacity of the storm network causing localised flooding.' One of the main award drains (The main 165 drain is located on site 112 in Impington). This is contrary to paragraph 100 in the NPPF.

Traffic surveys have shown that vehicle movements have significantly increased over recent years in relation to site 112 and this data, which impacts on the safety of the transport network and individual road users, should be available but has not been used in the assessment of sites.

HAIVAG commissioned a traffic survey to be undertaken in Impington Lane. The survey was carried out from Saturday 6 September 2014 to Friday 12 September 2014 inclusive, a period of 7 days. The survey recorded vehicle movements, vehicle speeds and vehicle classifications over 15 minute periods. Appendix 1 contains summaries of the reports. The location of the survey was adjacent to the access to one of the proposed development sites (Land to the North of Impington Lane) contained in the Local Plan and to which HAIVAG object.

In 2008 the parish council undertook a similar survey in the same location during the period Wednesday 17 September 2008 to Tuesday 23 September 2008. This is included in Appendix 2. A direct comparison can therefore be made which shows a significant increase in traffic in the 6 year period as set out in the following table.

Summary of Data From Impington Lane Traffic Surveys			
	2008	2014	% Increase
Weekly Totals			
Total Number of Vehicles Mon to Sun	23739	26260	11%
Total Number of Vehicles Mon to Fri	18285	20903	14%
Average Weekday	3657	4181	14%
Peak Hour Totals 8 to 9am			
Total Number of Vehicles (Mon to Fri)	1986	2584	30%
Average Weekday	397	517	30%
Peak Hour Totals 4 to 6pm			
Total Number of Vehicles	3255	3695	14%
Average Weekday	651	739	14%

It can be seen that traffic has increased by 14% but with a much greater increase between 8 and 9am which shows a 30% increase. There are queues daily during peak periods.

Impington Lane is a residential street approximately 5.5m wide. Cars are usually parked on one or the other side restricting the road's width even further. It is a main thoroughfare to Impington Village College with students using it on a twice daily basis. A new junction along Impington Lane to access a new development would compound the safety risk.

The following appendices form the data used.

Appendix 1 – 2014 Traffic Survey

1A – Location of Survey

1B – Speed Summary

1C – Volume Summary

Appendix 2 – 2008 Traffic Survey

2A – Summary

2B – Eastbound Details and Summary

2C – Westbound Details and Summary

A lack of robust assessment at the SHLAA stage has meant that sustainability issues were not thoroughly or accurately assessed. A realistic assessment

would show that development may in fact make the community generally less sustainable due to the pressures on infrastructure. Knowledge of these issues is key to the release of a deliverable Local Plan that truly supports sustainable development. The SHLAA for site 112 fails to assess key issues of Education, Flood Risk and Transport but suggests that the provision of open space within the development makes it sustainable. Such assessments cannot be considered robust.

The urgent need for new housing within the greater Cambridge area should be weighed against the impact of commuter car journeys between Histon and the new research parks at Addenbrookes Biomedical campus which is on the diametrically opposite side of Cambridge City. (Note site 112 is almost a mile from the guided busway and the service bus takes over an hour to reach Addenbrookes in peak periods.) The placement of housing should be adjacent to jobs. It makes more sense to place more dwellings near to the south of the City and jobs growth anticipated there.

Releasing very small amounts of land from the Green Belt in rural locations is not sustainable because of the harm it causes to the Green Belt and the negative impact it has on existing infrastructure and the sustainability of an existing community.

3. Pre-conceived assumption of exceptional circumstances for all sites located on existing Green Belt:

It is accepted (reluctantly) that in order to meet the Cambridge City and SCDC housing number trajectories for the 2031 period, adjustments have had to be made to the inner Green Belt, in line with the modified criteria for Green Belt purpose, using the “exceptional circumstances” described by NPPF para 82. However, once the housing numbers achieve their target numbers, the exceptional circumstances no longer apply and the full NPPF criteria for Green Belt protection should be applied.

Not enough weight has been given to the potential harm to the Green Belt in all village locations (NPPF para 88).

Matter 2b

The strategic level decision making process is well described in South Cambridgeshire Local Plan Submission Sustainability Appraisal Appendix 1: Reviewing the Sustainable Development Strategy for the Cambridge Area. However, considering the accuracy of the foundation data used in higher level decision making, SCDC have generated detailed reports on each of the potential development sites, which appear to be accurate and as comprehensive as is possible without specific local knowledge.

However, for use in site comparisons and as core data in the process used to make the more strategic choice of site package combinations, the detailed site data has been distilled into less comprehensive “sustainability assessment matrices”. Much of the public concern over the site selection process has been caused by the use of these matrices, which omit some key sustainability information such as Green Belt status.

The sustainability assessment matrices include some entries making inappropriate assumptions and others that do not provide a meaningful measure of sustainability at all. For example, the SHLAA for site 112 asks: ‘Will it improve accessibility to key local services and facilities, including health, education and leisure (shops, post offices, pubs, sports facilities etc?)’ and that is answered by the statement ‘Rural Centre’. A realistic assessment would show that development will in fact make the community generally less sustainable due to the pressures on infrastructure. Any new development should contribute to the sustainability of existing communities.

The acceptance or rejection of sites is sometimes illogical. The same reasons for rejecting a site have been applied to sites that have been included in the Plan. For example, Site 260 in Cottenham which is a Greenfield site and was allocated for development 10 years ago. The Council’s reasons for rejection of

this site were not consistently applied across all other sites and as far as we can tell is the only time the criteria of 'does not make best use of brownfield land has been used'. Sites should be assessed on an equal footing.

Other concerns that we have about the development strategy:

- It appears that sites were rejected, particularly in the group villages, before the overall strategy was defined.
- All Group Village sites were rejected en masse with the reason given that there should be no development allocations in Group Villages.
- There may be a need (and indeed the recent changes to the draft Local Plan, for example at Gravely where there has been a Parish Council
- led proposal, demonstrate this) for some group villages to build new dwellings to ensure sustainability. By taking the approach that there should be no development allocations in Group Villages, it significantly reduces any chances of new housing stock for a number of years going forward and in some cases may impact on viability of services. This denies the opportunity to address need in local communities and is not compliant with NPPF para 55.
- Additionally, it appears that the Council has not protected the Green Belt when other sites (sometimes Brownfield) in a group village/infill village, which appear viable, have not been allocated to the Plan. An example of this is the 'Oakington Tomato Farm' site where a mixed Brownfield and Greenfield site is available, close to current services and the Guided Bus. This conflicts with paragraph 17 in the NPPF.

Updates to the detailed site description made as a result of the consultation process, have not been made to the corresponding sustainability assessment matrix. (County Council Education Officers input May 2013 to SCDC site 133).

The scoring process used when arriving at a composite result for combination "packages" of sites also shows some inconsistencies. (South Cambridgeshire Local Plan Submission Sustainability Appraisal Appendix 4: Appraisal of Alternatives Site Packages). The inconsistency of scoring produced

unacceptable discrepancy and confusion when comparing similar sites in other villages.

It could be argued that the information available within the matrices was adequate to enable the planners to make comparisons at a top level in order to home-in on the package concept that seems the best way forward. It is however unfortunate that when the raw data in the matrices is studied, by county residents with specific site interest and local knowledge, confidence in the planning process is likely to be placed at risk.

It is not clear why South Cambs DC took the strategy of not including windfall sites in their 5-year allocation when historic windfall delivery rates have been good. The City Council is also anticipating a significant level of windfall sites which could be used to offset the need for South Cambs DC to allocate small amounts of Green Belt.

Matter 2c

With the exception of the issues raised in connection with the questions above, the evidence base appears to be credible.

Appendix 1a

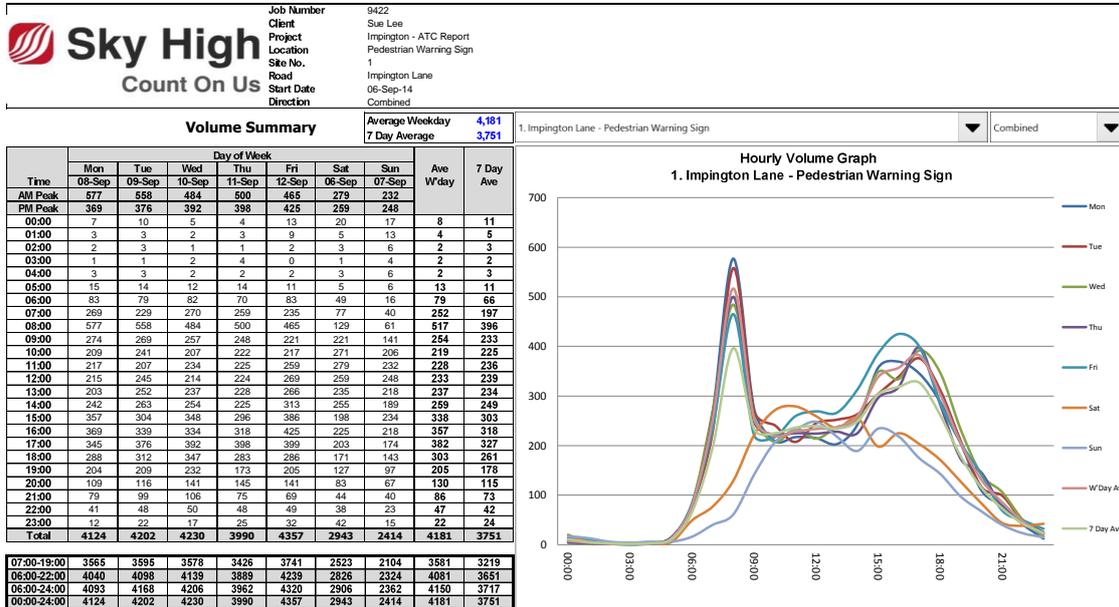
	Client:	Sue Lee
	Project:	Impington - ATC Report
	Job Number:	9422
	Start Date:	06-Sep-14
	Site No.:	1
	Road:	Impington Lane
	Location:	Pedestrian Warning Sign
Directions:	Eastbound Westbound	

1. Impington Lane - Pedestrian Warning Sign



Histon and Impington Village Action Group
 20061
 Representative: Sue Lee
 South Cambridgeshire Local Plan Matter 2

Appendix 1c



Appendix 2a

37216		HISTON & IMPINGTON				SEPTEMBER 2008					
Site	Location	Direction	Start Date	End Date	Posted Speed Limit (PSL)	Total Vehicles	5 Day Ave.	7 Day Ave.	85%ile Speed	Mean Speed	
Site No: 37216009	Site 9, Impington Lane - Att to Street Light TL44330 63425	Channel: Eastbound	Wed 17-Sep-08	Tue 23-Sep-08	20	12205	1875	1744	31.0	25.6	
		Channel: Westbound	Wed 17-Sep-08	Tue 23-Sep-08		11534	1782	1648	30.6	25.2	

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Appendix 2b

37216	HISTON & IMPINGTON		Site No: 37216009		Location		Site 9, Impington Lane - Att to Street Light		
	Channel: Eastbound								
TIME PERIOD	Wed 17/09/08	Thu 18/09/08	Fri 19/09/08	Sat 20/09/08	Sun 21/09/08	Mon 22/09/08	Tue 23/09/08	5-Day Av	7-Day Av
Week Begin: 17-Sep-08									
00:00	1	8	3	11	19	4	4	4	7
01:00	2	0	1	2	9	1	2	1	2
02:00	2	1	0	2	4	1	0	1	1
03:00	1	0	0	4	3	0	1	0	1
04:00	2	1	3	2	1	2	2	2	2
05:00	6	5	4	4	1	7	4	5	4
06:00	12	13	9	4	1	7	11	10	8
07:00	51	85	45	20	12	55	59	59	47
08:00	117	128	135	43	10	124	127	126	98
09:00	80	116	103	94	55	84	96	96	90
10:00	81	91	81	173	82	91	82	85	97
11:00	119	111	107	184	109	83	90	102	115
12:00	98	109	101	147	157	92	125	105	118
13:00	109	116	121	133	110	129	94	114	116
14:00	100	121	116	114	82	100	107	109	106
15:00	176	198	211	131	112	174	190	190	170
16:00	188	205	205	120	126	171	181	190	171
17:00	205	245	237	148	111	236	206	226	198
18:00	151	169	142	87	95	147	149	152	134
19:00	122	125	120	71	49	142	110	124	106
20:00	62	110	80	38	31	57	67	75	64
21:00	45	51	45	32	15	48	104	59	49
22:00	23	30	16	27	16	27	30	25	24
23:00	10	17	26	20	8	12	12	15	15
12H,7-19	1475	1694	1604	1394	1061	1486	1506	1553	1460
16H,6-22	1716	1993	1858	1539	1157	1740	1798	1821	1686
18H,6-24	1749	2040	1900	1586	1181	1779	1840	1862	1725
24H,0-24	1763	2055	1911	1611	1218	1794	1853	1875	1744
Am	11:00	08:00	08:00	11:00	11:00	08:00	08:00	-	-
Peak	119	128	135	184	109	124	127	127	132
Pm	17:00	17:00	17:00	17:00	12:00	17:00	17:00	-	-
Peak	205	245	237	148	157	236	206	226	205



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Appendix 2c

37216	HISTON & IMPINGTON		Site No: 37216009		Location		Site 9, Impington Lane - Att to Street Light			
	Channel: Westbound									
TIME PERIOD	Wed 17/09/08	Thu 18/09/08	Fri 19/09/08	Sat 20/09/08	Sun 21/09/08	Mon 22/09/08	Tue 23/09/08	5-Day Av	7-Day Av	
Week Begin: 17-Sep-08										
00:00	1	3	4	9	14	4	1	3	5	
01:00	0	1	1	5	2	0	3	1	2	
02:00	2	1	0	1	4	1	0	1	1	
03:00	1	1	0	1	1	0	0	0	1	
04:00	2	3	2	1	0	2	4	3	2	
05:00	5	3	4	2	2	4	4	4	3	
06:00	25	19	25	8	4	21	15	21	17	
07:00	90	78	93	35	13	104	91	91	72	
08:00	256	274	277	55	21	267	280	271	204	
09:00	229	219	167	139	77	176	165	191	167	
10:00	92	115	87	204	100	103	114	102	116	
11:00	87	117	98	161	111	90	116	102	111	
12:00	81	88	104	123	111	83	102	92	99	
13:00	100	116	100	126	100	91	90	99	103	
14:00	95	98	126	133	95	94	97	102	105	
15:00	158	138	143	104	104	128	132	140	130	
16:00	100	120	121	78	73	93	122	111	101	
17:00	116	127	143	97	95	125	109	124	116	
18:00	113	127	103	87	68	104	130	115	105	
19:00	75	98	80	62	43	83	106	88	78	
20:00	42	75	61	33	24	48	54	56	48	
21:00	21	29	32	24	15	37	33	30	27	
22:00	21	26	21	28	12	11	20	20	20	
23:00	10	20	21	15	5	10	11	14	13	
12H,7-19	1517	1617	1562	1342	968	1458	1548	1540	1430	
16H,6-22	1680	1838	1760	1469	1054	1647	1756	1736	1601	
18H,6-24	1711	1884	1802	1512	1071	1668	1787	1770	1634	
24H,0-24	1722	1896	1813	1531	1094	1679	1799	1782	1648	
Am	08:00	08:00	08:00	10:00	11:00	08:00	08:00	-	-	
Peak	256	274	277	204	111	267	280	271	238	
Pm	15:00	15:00	17:00	14:00	12:00	15:00	15:00	-	-	
Peak	158	138	143	133	111	128	132	140	135	

